



WWW.RIVKINRADLER.COM

926 RXR Plaza
Uniondale, NY 11556-0926
T 516.357.3000 F 516.357.3333

JACQUELINE BUSHWACK
(516) 357-3239
jacqueline.bushwack@rivkin.com

July 16, 2018

VIA ECF

Honorable Judge Robert W. Sweet
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: *Hudson, in his individual capacity on behalf of himself and others similarly situated v. National Football League Management Council, et. al.*
Civil Index No.: 1:18-cv-4483-RWS

Dear Judge Sweet:

Our firm, along with Groom Law Group, represents Defendants, the Retirement Board of the Bert Bell/Pete Rozelle NFL Player Retirement Plan, Katherine “Katie” Blackburn, Richard “Dick” Cass, Ted Phillips, Samuel McCullum, Robert Smith, and Jeffrey Van Note in connection with this matter (collectively the “Retirement Plan Defendants”).

The Retirement Plan Defendants respectfully request, with the consent of all parties, an extension of time for all Defendants to answer, move against, or otherwise respond to Plaintiff, Christopher Hudson’s Complaint from July 23, 2018 to August 31, 2018, and for the entry of a briefing schedule for Defendants’ anticipated Rule 12 motions to dismiss. The particulars of the parties’ agreement and proposed schedule are outlined in the annexed stipulation, which the parties ask the Court to approve.

The Court should be advised that the parties have not sought or received any prior extensions of their respective pleading or motion deadlines. Inasmuch as the Court has yet to enter a scheduling order in this case, the parties submit that the requested extension(s) will not affect any other scheduled dates.

Respectfully submitted,

RIVKIN RADLER LLP

A handwritten signature in black ink, reading 'Jacqueline D. Bushwack', written over a light blue horizontal line.

Jacqueline Bushwack

JDB

cc: All parties of record via ECF

9 Thurlow Terrace
Albany, NY 12203-1005
T 518.462.3000 F 518.462.4199

21 Main Street, Court Plaza South
West Wing, Suite 158
Hackensack, NJ 07601-7021
T 201.287.2460 F 201.489.0495

477 Madison Avenue
New York, NY 10022-5843
T 212.455.9555 F 212.687.9044

2649 South Road
Poughkeepsie, NY 12601-6843
T 845.473.8100 F 845.473.8777